



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 19, 2021

BY ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Application granted. The conference is adjourned to July 9, 2021 at 9:00 a.m. Time is excluded until July 9, 2021, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161 (h)(7)(A).

SO ORDERED.

Re: *United States v. Richard Martinez*, 21 Cr. 27 (RA)

Ronnie Abrams, U.S.D.J.
May 21, 2021

Dear Judge Abrams:

This case is currently scheduled for a status conference on Tuesday, May 25, 2021. The parties are currently engaged in discussions regarding a pretrial disposition of the case and believe that additional time to continue those discussions would be beneficial. Accordingly, the parties jointly request a 45-day adjournment of the upcoming status conference. If an agreement regarding a pretrial disposition is reached in the interim, the parties will contact the Court so that a change-of-plea proceeding can be scheduled.

The Government requests the exclusion of time in the interests of justice under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), from today's date until the adjourn date selected by the Court. The ends of justice served by the requested continuance outweigh the interests of the defendant and the public in a speedy trial because the continuance will allow the parties to continue discussions regarding a pretrial disposition; will allow the defense additional time to review the discovery in this case to determine whether any pretrial motions may be appropriate; and will reflect the current limitations on the scheduling of jury trials in this District occasioned by the ongoing COVID-19 pandemic. The defense consents to the requested exclusion.

Respectfully submitted,

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by:

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cc: Tamara Giwa, Esq.